

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	
v.	:	Magistrate Judge Hogan
	:	
AK STEEL CORPORATION	:	DECLARATION OF
	:	<u>PATRICIA ANDERSON PRYOR</u>
Defendant.	:	

Patricia Anderson Pryor truthfully states the following is based on her personal knowledge and further truthfully states that she was competent to testify if called.

1. I am a partner in the law firm of Taft, Stettinius & Hollister LLP. I am one of the attorneys representing the Defendant AK Steel Corporation in the above-referenced matter.

2. On October 29, 2002, we served Defendant's First Request for Production of Documents to Ronald Sloan, Defendant's First Request for Production of Documents to Mary Harris and Defendant's First Request for Production of Documents to Thaddeus Freeman. Each of these Plaintiffs responded to these requests on November 27, 2002. Attached as Exhibit 1 are Ronald Sloan's Responses. Attached as Exhibit 2 are Mary Harris' Responses. Attached as Exhibit 3 are Thaddeus Freeman's Responses.

3. On February 3, 2003, Plaintiffs served us with their Initial Disclosures as required by Rule 26. Attached as Exhibit 4 are Plaintiff's Initial Disclosures.

4. On March 22, 2007, we served each of the Plaintiffs with Defendant's First Set of Interrogatories. Attached as Exhibit 5 are the responses we received from Mary Harris. Attached as Exhibit 6 are the Responses we received from Thaddeus Freeman.

5. Attached as Exhibit 7 is a copy of Plaintiff Mary Harris' Debtor Schedules and Statement of Financial Affairs in connection with her Chapter 7 Voluntary Petition for Bankruptcy, filed in Case No. 1:03-bk-10171, which we obtained from the United States Bankruptcy Court for the Southern District of Ohio.

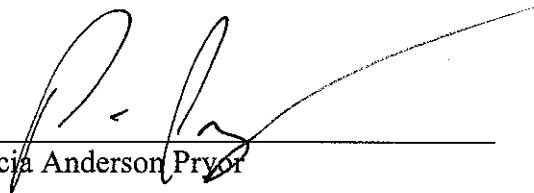
6. The United States Bankruptcy Court for the Southern District of Ohio now has an on-line, electronic system, whereby the documents filed with it can be viewed and retrieved through the internet. Attached as Exhibit 8 is a copy of the Discharge of Debtor dated May 13, 2003, which we printed from the Bankruptcy Court's on-line docket for Case No. 1:03-bk-10171. According to the docket, Ms. Harris' bankruptcy case was closed on June 23, 2003. Attached as Exhibit 9 is a copy of the docket in Case No. 1:03-bk-10171, also printed from the United States Bankruptcy Court for the Southern District of Ohio's web site.

7. Attached as Exhibit 10 is a copy of Plaintiff Thaddeus Freeman's Chapter 7 Voluntary Petition for Bankruptcy, including the Debtor Schedules and Statement of Financial Affairs, filed in Case No. 3:03-bk-36704, which we obtained from the United States Bankruptcy Court for the Southern District of Ohio.

8. Attached as Exhibit 11 is a copy of the Discharge of Debtor dated December 9, 2003, which we printed from the Bankruptcy Court's on-line docket for Case No. 3:03-bk-36704. According to the docket, Mr. Freeman's bankruptcy case was closed on December 17,

2003. Attached as Exhibit 12 is a copy of the docket in Case No. 3:03-bk-36704, also printed from the United States Bankruptcy Court for the Southern District of Ohio's web site.

I declare under penalty of perjury that the foregoing is true and accurate. Signed this 14th day of May, 2007.



Patricia Anderson Pryor